

## **Rocky Flats Citizens Advisory Board 2005 Transition Work Plan**

Approved September 9, 2004

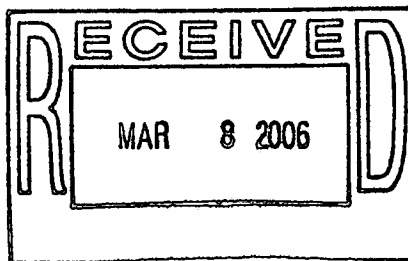
### **Executive Summary**

The U.S. Department of Energy's published policy on public participation and community relations states, "Effective public participation is at the core of good community relations, which is essential for DOE facilities to achieve their missions." The Rocky Flats Citizens Advisory Board (Board), established in 1993, enables concerned citizens to gain information and understanding about the work being planned or performed at the Rocky Flats Closure Project. The Board facilitates the gathering of diverse opinions and perspectives from communities within the vicinity of Rocky Flats, thereby assisting the Department in making more informed decisions on cleanup and closure activities.

The Board's mission is:

The Rocky Flats Citizens Advisory Board, a nonpartisan, broadly representative, independent advisory board with concerns related to Rocky Flats activities, is dedicated to providing informed recommendations and advice to the agencies (Department of Energy, Colorado Department of Public Health and Environment, and the Environmental Protection Agency), government entities and other interested parties on policy and technical issues related to cleanup, waste management, stewardship and associated activities. The Board is dedicated to public involvement, awareness, and education on Rocky Flats issues.

As Rocky Flats transitions its work and workforce for closure, so must the Board. The purpose of this plan is to identify and discuss the work being performed by the Board, the resources needed to perform that work, and how the Board can continue to support the Department's closure mission, as well as with its post-closure and long-term stewardship responsibilities. As closure is nearing completion, post-closure and long-term stewardship activities are being identified, defined, and planned. The Board can play a vital role in assisting the Department with these activities as it has in the past with cleanup and closure activities. Gaining public understanding and acceptance of the work to be or being performed can build mutual understanding and trust. The history of the Board, its interaction with local communities and public interest groups, and the successful partnership with DOE and federal and state regulators distinguishes the Board's ability to achieve its mission of providing policy and technical recommendations with public involvement, awareness, and education.



ADMIN RECORD

## Introduction

In the early 1990s, the U.S. Department of Energy (DOE) created Site Specific Advisory Boards at current and former nuclear weapons complex sites chartered under the Federal Advisory Committee Act of 1972. The purpose of the Department's Boards was to improve public involvement in cleanup decisions at the sites. There are currently nine Boards in existence across the country.

The Rocky Flats Citizens Advisory Board (Board) was established in 1993 and enabled concerned citizens to gain information and understanding about the work performed at Rocky Flats from a variety of sources including Board and staff members, DOE, and Federal and State regulators. The Board serves two primary purposes -- providing policy and technical comments and recommendations as well as engaging the public and the DOE in open dialogue. Now in its twelfth year, 86 individuals have served as Board or staff members. Currently, 13 Board members with diverse backgrounds and opinions represent citizens, communities, and organizations in the vicinity of the Rocky Flats Closure Project site. The Board is supported by two staff members.

The Rocky Flats Closure Project was designated as an accelerated closure pilot project by the Secretary of Energy in 1997, and supported by Congress through special closure project funding. The Secretary chose the site for several reasons. Chief among them was that Rocky Flats was the largest former nuclear weapons production facility positioned for accelerated closure. The project is currently ahead of schedule and actual closure is expected to be months earlier than the planned closure date of December 15, 2006, thereby saving the federal government, and ultimately the taxpayers, millions of dollars.

The Board has played a significant role in providing policy and technical recommendations on cleanup and closure activities to the Department. The Board operates under a consensus decision-making process. The value to this process is that all opinions are voiced, considered, dispositioned, and/or reconciled prior to recommendations being forwarded to the Department and its closure contractor, Kaiser-Hill. Some key examples of these recommendations are:

- Community Involvement in Rocky Flats Cleanup Plans: With involvement from citizens in the area surrounding Rocky Flats, the Board produced a list of Community Values. Some of the values were incorporated into the original Rocky Flats Cleanup Agreement in 1995. The Board also wrote a white paper entitled, "Plutonium at Rocky Flats: A Framework for Decision-Making" outlining community views on the safe storage and ultimate disposition of plutonium. In 1999, the Board developed and published the "Vision for Cleanup at Rocky Flats." Numerous points expressed in this document were incorporated into the cleanup plans for the site. These efforts enabled the Board to involve the broader community in developing the materials and later served as education and outreach tools to local communities.
- Funding and Priorities for Cleanup at Rocky Flats: The Board, along with the Colorado Department of Public Health and Environment and the U.S. Environmental Protection Agency, recommended that the site delay some environmental restoration

projects in areas of less risk so that funding could be applied to areas of greater risk. Ultimately, \$31 million was shifted toward the more critical projects resulting in more rapid risk reduction. The Board proposed mortgage reduction activities for buildings that had no future site purpose. Those funds were then applied to accelerated cleanup activities. Another recommendation was to accelerate the consolidation of plutonium into one or two facilities so that the vacated facilities could be turned over to the mortgage reduction program. These activities eventually became the centerpiece of the closure project that had support from the communities.

- Independent Review of the Soil Action Levels: The Board and representatives from local governments recommended that the Department fund an independent assessment of the soil action levels due to an uproar from citizens that the levels were too high. The Board served as the contract manager for the assessment. The assessment resulted in greater understanding by the community on the science behind determining action levels and led to less apprehension about the science when the Department and its regulators recently revised the action levels.
- Independent Review of Environmental Monitoring: The Board contracted for an independent review of environmental monitoring activities at the site. The review raised awareness that environmental monitoring was an important issue for the community. This led to greater involvement by the community in ongoing site activities such as the Integrated Monitoring Plan.
- Comments and Recommendations Related to the Actinide Migration Evaluation: The Board contracted with two experts to review and comment on work products of the Actinide Migration Evaluation (AME). The Board formed a Technical Review Group to closely follow the AME studies and work with the experts. The experts served as an independent, credible resource that provided greater community confidence in the work of the AME. Many of the comments and suggestions were incorporated into the AME.
- Community Workshop on Future Public Participation at Rocky Flats: In 2004, the Board sponsored a community workshop on future public participation at Rocky Flats. Members of the community, Board members, and representatives from the Department of Energy's Office of Legacy Management participated in the full-day discussion and developed a list of ideas about future public participation. A workshop summary is posted on the Board's webpage.

### **Work Scope Focus Areas**

The Board is organized as a non-profit organization that is funded annually through a grant from the DOE. Emphasis is placed on independent technical review and assistance, as well as independent control of staff and operations. Annual work plans identify areas of focus to be addressed by the Board. The work is performed through committees comprised of Board members. Community members with technical expertise are also available to the Board. When deemed necessary, the Board contracts out for subject matter experts to perform independent peer reviews to provide the Board with impartial

and credible technical feedback. These independent peer reviews have increased the credibility and confidence of the work being performed.

An important function for the Board is document review. The Board reviews and comments on reports or other written material associated with the closure project that are of interest to surrounding communities as well as the Board. Recommendations on these various reports and documents are provided to the Department.

Cleanup and closure progress is monitored by the Board on a routine and continuous basis. Updates are provided at monthly board and committee meetings. Representatives of the Board participate in meetings sponsored by the site. Ongoing environmental monitoring activities continue to be an important issue for the communities. The Board's oversight of these activities provides a greater knowledge and involvement from the public.

Specific work scope focus areas currently planned are as follows:

**Site Cleanup and Closure:** Site closure involves many individual projects occurring simultaneously. Some of the projects are environmental cleanup activities to remove contamination from the land and water. The majority of the site cleanup activities are building decontamination and demolition projects. The Board provides comments on plans for environmental restoration and building decontamination projects as they are released for public review. As project activities begin, the Board monitors their progress, paying attention to the schedule, worker health and safety concerns, and potential environmental impacts, especially air and water quality.

- Environmental Restoration Projects: The Board has provided comments on the plans for many environmental restoration projects. As those projects are implemented, the Board monitors their progress. Current projects underway include:
  - 903 Pad Lip Area: Dispersed plutonium soil contamination is being removed from this area.
  - Original and new process waste lines: All lines less than three feet deep are being removed. Other lines may be left in place, especially those greater than six feet deep.
  - Carbon tetrachloride plume source removal: This project will remove the contamination source for a groundwater contamination plume.
  - Building 443 oil leak: This is another source removal project to protect groundwater.

The Board also will provide comment on plans for upcoming projects including:

- Present Landfill: A former sanitary landfill, this site will have a soil cover installed.
- Original Landfill: A former dump along a hillside in the Women Creek drainage will be stabilized, regarded and covered with soil.
- Groundwater Interim Measure/Interim Remedial Action: The site proposes to develop a comprehensive strategy to address groundwater contamination at the site.
- B-series ponds remediation: Contaminated sediments in these drainage ponds need to be removed.

- Bowman's Pond remediation: A shallow basin in the former protected area at the site where waste materials were dumped will require remediation.
- Building Decontamination & Demolition Projects: As the site closure moves closer to completion, the scope of building decontamination and demolition work will increase dramatically. Plans for numerous projects have already been reviewed and commented on by the Board. Due to the one-of-a-kind challenges in performing this work, modifications to the plans are often developed. The Board will review and comment on these modifications as they arise. The Board also monitors the work progress, paying particular attention to work schedules, worker health and safety issues, and environmental impacts. Major building projects the Board continues to monitor include:
  - Building 371/374: A former plutonium operations and storage building, this large facility will be one of the last torn down at the site. Contamination in the former storage vaults and areas contaminated by spills of materials will be of particular interest. Portions of the building six feet below the surface that may still have some contamination below the regulatory standards will be left in place.
  - Building 444: Part of the large machining operation at the site, this building has contamination problems due to the presence of beryllium and uranium.
  - Building 447: Also part of the machining operations, beryllium and uranium contamination are primary concerns. Parts of the building may not be cleaned up to free release standards and will require special demolition techniques.
  - Building 559: A former laboratory building, this building's main contaminant concerns are due to plutonium.
  - Building 707: One of the oldest plutonium operations facilities at the site, this building is a challenge due to asbestos and plutonium. The building also housed a large plutonium storage vault.
  - Building 771: The site of one of the large fires during the site's history, this building will present a demolition challenge because all of the contamination will not be removed. Portions of the building below six feet will be left in place.
  - Building 776: This building is another former plutonium facility that also was the site of a large fire. Not all of the contamination will be removed before demolition. The site proposes to use rail to transport building debris to the waste receiver site in Utah.
  - Building 883: Another large machining facility with uranium contamination, this building presents a challenge due to the large pieces of machinery, such as rolling mills and presses that are present.
- Orphan Wastes: Some waste streams remaining from the weapons production era, as well as some generated during the remediation process, are proving difficult to find an acceptable treatment and/or disposal location. Continued storage of these wastes at Rocky Flats could affect the closure schedule. The Board will monitor the disposition of these wastes and their impact on the closure schedule.

**Regulatory Closure:** Once the physical work is finished, various activities will need to be performed and documents produced to finalize the closure project. Work on some of these activities and documents is currently underway, while work on others could be years away. One of the most important activities will be for the site to complete a required Corrective Action Decision / Record of Decision (CAD/ROD). This document will review the work that has taken place at the site, analyze the risk from any remaining contaminants, both for human and ecological receptors, and determine what, if any, work remains to be done. The site anticipates that no further work will be necessary, beyond monitoring and maintenance as part of a long-term stewardship program. The Board anticipates that completion of the CAD/ROD will extend beyond the date when physical cleanup work at the site by at least a year, if not more. The Board further believes that its work as an advisory body to the Department of Energy must continue until after the CAD/ROD is released for public review and comment.

Other regulatory closure activities the Board will monitor and comment upon as necessary include:

- Comprehensive Risk Assessment: This risk assessment will provide the information necessary to complete the CAD/ROD. It will focus on both human and ecological risk.
- Remedial Investigation / Feasibility Study: Completion of this work also is a precursor to developing the CAD/ROD.
- Post-Closure Agreement: The Department of Energy, the state of Colorado, and the Environmental Protection Agency will need to sign a final agreement outlining work and activities to monitor and maintain the site will be necessary as part of a long-term stewardship program. Negotiations to develop the agreement, which will build on the agreement already in place for the closure activities, are already underway.
- EPA Certification: Before the site can be delisted as part of Superfund and turned over to the U.S. Fish and Wildlife Service as a National Wildlife Refuge, the Environmental Protection Agency (EPA) will need to certify that the work is done and that public health and safety is no longer in jeopardy.

**Post-Closure Planning:** Upon closure, the majority of the Rocky Flats site will become a National Wildlife Refuge, while the remaining portions will remain under control of the Department of Energy Office of Legacy Management due to residual contamination concerns. There are three primary areas the Board will focus on in addressing post-closure planning:

- Refuge Development: The Board has commented on the draft Comprehensive Conservation Plan for the refuge. The U.S. Fish and Wildlife Service will issue a final Environmental Impact Statement (EIS) in 2005. The Departments of Interior and Energy are still negotiating a Memorandum of Understanding (MOU) outlining their future roles at the refuge. The Board will continue to track the progress of both the EIS and MOU and any other refuge planning activities.
- Environmental Management to Legacy Management Transition: Upon closure, management responsibility for Rocky Flats will transfer from the Office of Environmental Management to the Office of Legacy Management. Legacy Management will serve as stewards for the contaminated portions of the site post-

closure. The development of a long-term stewardship program will occur during the transition period. The Board will track development of the program and provide input during the process.

- Post-closure Public Involvement: Rocky Flats has a long history of public interest and involvement. Because contamination will remain at the site post-closure, the public will continue to seek a role at the site. The Board will work during the site transition period to help define the public's role in site decision-making and monitoring for the post-closure period.

**Outreach and Education:** Community outreach and public education is an important part of the Board's role. The Board uses the following outreach and education tools:

- Community Outreach Workshops: The Board plans on conducting workshops to actively seek the views of concerned residents and surrounding communities. The workshops will serve to inform and educate the public on closure activities at the site. In 2005, the Board will sponsor workshops on future public involvement at Rocky Flats and on the regulatory closure process.
- Newsletter and Annual Report: The Board will publish at least two newsletters throughout the year focusing on site closure progress and the Board's activities. The Board also publishes an annual report summarizing its activities for the previous year.
- Speaker's Bureau: Because of interest about Rocky Flats within the community, the Board periodically receives requests for presentations. Currently, the Board has a 35mm slide presentation. In 2005, the Board plans to update its presentation so that it is available electronically. The Board also will increase its marketing efforts to inform community groups or organizations that the presentation is available.
- Press Releases / Letters to the Editor / Meetings with Editorial Boards: As a means to provide information about the Board and its views on site closure activities, the Board will develop press releases and letters to the editor, as well as meet with editorial boards.
- Website: The Board maintains a website providing information about its activities and those at the site. The website also provides links for finding additional information and also provides a link for viewers to communicate with the Board.

**National Participation:** As part of the National Environmental Management Site Specific Advisory Board (EMSSAB), the Board participates in the following activities:

- Semiannual Chairs' Meetings: The Chairs and other officers of the nine local advisory boards at Department of Energy sites come together at least twice a year for meetings. At these meetings, the Chairs discuss issues of common concern and interact with representatives from the Department of Energy.
- Workshops: At least once a year, the EMSSAB sponsors a workshop on a particular issue of concern that is common to all the nine local sites. In the past these workshops have included discussions on waste management, long-term stewardship, and groundwater contamination. The goal of each workshop is to discuss the topic and then develop draft recommendations that can be reviewed and approved by the local boards. After each local board approves the recommendations they are forwarded to the Department of Energy as a joint recommendation.

### **Board Closure Plan and Activities**

The Board anticipates continuing operation until after it has commented on the draft Corrective Action Decision / Record of Decision (CAD/ROD) that DOE will release post-closure. At its end, the Board will publish a final report to the community outlining the major work of the Board since its inception. The report will document the Board's contribution to accelerated cleanup and closure of the site and outline lessons learned from the Board's perspective. Final recommendations from the Board to the DOE will be included in the final report, along with a discussion about the necessity and scope of work for future public participation efforts related to the post-closure and long-term stewardship activities.

As a 501 (c)(3) non-profit organization, the Board also will need to complete various administrative activities necessary to shut down the organization.